

OFFICE OF THE CHAPTER 13 STANDING TRUSTEE

Andrew B. Finberg, Esquire
Cherry Tree Corporate Center
535 Route 38, Suite 580
Cherry Hill, NJ 08002
(856) 663-5002

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
(Camden)

IN RE:

Wanda K. Lee-Jackson,

Debtors

Case No. 24-18268 (JNP)

Hearing Date: N/A

Judge: Jerrold N. Poslusnsy, JR.

APPLICATION FOR ENTRY OF CONSENT ORDER IN LIEU OF MOTION
UNDER D.N.J. LBR 9013-1(j)(1)

The application of Andrew B. Finberg, Chapter 13 Standing Trustee (“Applicant”) respectfully represents:

1. Debtor has filed for bankruptcy protection five (5) times since 2018. In lieu of the Trustee filing a Motion to Dismiss Case for Bad Faith Filings, the parties have agreed to entry of a Consent Order allowing Debtor’s case to continue and imposing a two-year bar on future filings in the event Debtor’s case is dismissed.
2. Applicant has contemporaneously filed the Consent Order Resolving Bad Faith Filings and Allowing Case to Continue and the Certification of Consent which sets forth the terms of the resolution of the matter.
3. Entry of the Consent Order is not prohibited under the Federal Rules of Bankruptcy Procedure or the D.N.J. LBR.

WHEREFORE, Applicant requests the entry of the Consent Order submitted herewith.

Dated: September 20, 2024

/s/ Andrew B. Finberg
Chapter 13 Standing Trustee